

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,
Plaintiff,

v.

KEITH HARPER,
JAMES CARR,
 aka SOLO,
ROBERT CARR,
 aka LIL' ROB,
CHARLIE COOPER,
JERRY CORNEY,
 aka PEANUT,
ARIYEN FLAKES,
 aka DUB,
WILLIE FLOWERS,
BILLY HARPER,
 aka FONTAINE,
DELVON JONES,
 aka LIL' B,
RAHFEL KING,
 aka ROCK,
FURNELL MILLS,
 aka JUGG,
JOHNNY MORGAN,
AARON NELSON,
 aka LIL' A,
TONYA NETTLES,
DAVID PERRY,
KENYADA PERRY,
 aka KIM,

I N D I C T M E N T

1:07CR323

CASE NO.

21 U.S.C. §846
21 U.S.C. §§841(a)(1)
(b)(1)(A), (b)(1)(B),
and (b)(1)(C)
21 U.S.C. §843(b)
18 U.S.C. §1952
18 U.S.C. §922(g)(1)

JUDGE NUGENT

-2-

EDWARD SIMS,)
 aka ID,)
 MACIO STUBBS,)
 DERRICK TERRELL,)
 aka DFUNK,)
 DIREZ WILLIAMS,)
 aka REZ,)
 BOBBY WILSON,)
 JEFFREY WOODS,)
 aka BIG JEFF)
 Defendants.)

INDEX

<u>Defendants</u>	<u>Counts</u>	<u>Charges</u>
KEITH HARPER	1	21 U.S.C. §846
	11, 22	21 U.S.C. §841(a) (1)
	37	21 U.S.C. §843(b)
JAMES CARR,	1	21 U.S.C. §846
aka SOLO	22	21 U.S.C. §841(a) (1)
ROBERT CARR,	1	21 U.S.C. §846
aka LIL' ROB	22	21 U.S.C. §841(a) (1)
CHARLIE COOPER	1	21 U.S.C. §846
	5, 6	21 U.S.C. §841(a) (1)
	28	21 U.S.C. §843(b)
JERRY CORNEY,	1	21 U.S.C. §846
aka PEANUT	16	21 U.S.C. §841(a) (1)
	27	21 U.S.C. §843(b)
ARIYEN FLAKES,	1	21 U.S.C. §846
aka DUB	20	21 U.S.C. §841(a) (1)
	35	21 U.S.C. §843(b)
WILLIE FLOWERS	1	21 U.S.C. §846
	23, 25	21 U.S.C. §841(a) (1)
	40	18 U.S.C. §922(g) (1)
BILLY HARPER,	1	21 U.S.C. §846
aka FONTAINE	21	21 U.S.C. §841(a) (1)
	36	21 U.S.C. §843(b)

-3-

<u>Defendants</u>	<u>Counts</u>	<u>Charges</u>
DELVON JONES, aka LIL' B	1 2	21 U.S.C. §846 21 U.S.C. §841(a)(1)
RAHFEL KING, aka ROCK	1 26 41	21 U.S.C. §846 21 U.S.C. §841(a)(1) 18 U.S.C. §1952
FURNELL MILLS, aka JUGG	1 3, 4	21 U.S.C. §846 21 U.S.C. §841(a)(1)
JOHNNY MORGAN	1 19, 24 34, 38	21 U.S.C. §846 21 U.S.C. §841(a)(1) 21 U.S.C. §843(b)
AARON NELSON, aka LIL' A	1 17	21 U.S.C. §846 21 U.S.C. §841(a)(1)
TONYA NETTLES	1 23, 25	21 U.S.C. §846 21 U.S.C. §841(a)(1)
DAVID PERRY	1 26 41	21 U.S.C. §846 21 U.S.C. §841(a)(1) 18 U.S.C. §1952
KENYADA PERRY, aka KIM	1	21 U.S.C. §846
EDWARD SIMS, aka ID	1 7, 8 29, 30	21 U.S.C. §846 21 U.S.C. §841(a)(1) 21 U.S.C. §843(b)
MACIO STUBBS	1 18 33	21 U.S.C. §846 21 U.S.C. §841(a)(1) 21 U.S.C. §843(b)
DERRICK TERRELL, aka DFUNK	1 9, 10, 12, 13 31, 32 39	21 U.S.C. §846 21 U.S.C. §841(a)(1) 21 U.S.C. §843(b) 18 U.S.C. §922(g)(1)
DIREZ WILLIAMS, aka REZ	1 15	21 U.S.C. §846 21 U.S.C. §841(a)(1)
BOBBY WILSON	1 17	21 U.S.C. §846 21 U.S.C. §841(a)(1)

-4-

<u>Defendants</u>	<u>Counts</u>	<u>Charges</u>
JEFFREY WOODS,	1	21 U.S.C. 846
aka BIG JEFF	14	21 U.S.C. §841(a)(1)

COUNT 1

The Grand Jury charges:

Beginning at least as early as January 2005, and continuing through May 2007, the exact dates to the Grand Jury unknown, in the Northern District of Ohio, Eastern Division, and elsewhere, KEITH HARPER; JAMES CARR, aka SOLO; ROBERT CARR, aka LIL' ROB; CHARLIE COOPER; JERRY CORNEY, aka PEANUT; ARIYEN FLAKES, aka DUB; WILLIE FLOWERS; BILLY HARPER, aka FONTAINE; DELVON JONES, aka LIL' B; RAHFEL KING, aka ROCK; FURNELL MILLS, aka JUGG; JOHNNY MORGAN; AARON NELSON, aka LIL' A; TONYA NETTLES; DAVID PERRY; KENYADA PERRY, aka KIM; EDWARD SIMS, aka ID; MACIO STUBBS; DERRICK TERRELL, aka DFUNK; DIREZ WILLIAMS, aka REZ; BOBBY WILSON; JEFFREY WOODS; aka BIG JEFF (named herein and indicted); Carl Henderson; Gerald Taylor; Maurion Lewis (named herein and not indicted); and others known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally combine, conspire, and confederate and agree together and with each other, and with diverse others to the Grand Jury known and unknown, to possess with intent to distribute and to distribute one kilogram or more of a mixture or substance containing a detectable amount of phencyclidine (PCP), a Schedule II controlled substance, in

-5-

violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

MANNER AND MEANS OF THE CONSPIRACY

It was part of the conspiracy that phencyclidine (PCP) would be obtained in California, transported to Cleveland, Ohio, and redistributed to various individuals including, but not limited to, individuals who identified themselves as members of the Hough Heights gang. Many of the members of the Hough Heights identify themselves with tattoos, graffiti, and hand signals. Ultimately, members of the conspiracy sold cigarettes laced with phencyclidine (PCP) to persons for their personal use.

It was the role of Carl Henderson, in furtherance of this conspiracy, to make arrangements in California for the purchase and transportation (by either couriers or DHL) of phencyclidine (PCP) to Cleveland, Ohio, for the purpose of redistribution.

It was the role of DAVID PERRY, Gerald Taylor, and Maurion Lewis, in furtherance of this conspiracy, to transport phencyclidine (PCP) to Cleveland, Ohio.

It was the role of KENYADA PERRY, in furtherance of this conspiracy, to assist in the receipt of packages of phencyclidine (PCP) shipped from California.

It was the role of RAHFEL KING, ROBERT CARR, and TONYA NETTLES, in furtherance of this conspiracy, to receive phencyclidine (PCP) from Carl Henderson and others for the

-6-

purpose of redistribution. It was further their role to distribute phencyclidine (PCP) to CHARLIE COOPER, JERRY CORNEY, ARIYEN FLAKES, WILLIE FLOWERS, KEITH HARPER, BILLY HARPER, DELVON JONES, FURNELL MILLS, JOHNNY MORGAN, AARON NELSON, EDWARD SIMS, MACIO STUBBS, DERRICK TERRELL, DIREZ WILLIAMS, BOBBY WILSON, and JEFFREY WOODS, who in turn redistributed the phencyclidine (PCP) to street dealers and users.

It was further part of the conspiracy that conspiracy members would direct buyers to other members of the conspiracy to conduct the drug transactions requested by the buyer.

It was further part of the conspiracy that conspiracy members would combine ("pool") their drugs in order to engage in drug sales of greater quantities.

OVERT ACTS

In furtherance thereof, and to effect the objectives of the conspiracy, the defendants and others performed overt acts not limited to the following acts in the Northern District of Ohio and elsewhere.

1. On June 23, 2006, at approximately 5:30 p.m., DELVON JONES met with a person cooperating with law enforcement (hereinafter "CI") and an undercover law enforcement officer (hereinafter "UCA") in the vicinity of East 93rd Street and Hough Avenue, Cleveland, Ohio, and sold approximately 22.67 grams of phencyclidine (hereinafter "PCP") for \$300.00.

-7-

2. A short time later and still on June 23, 2006, the CI and UCA traveled to Amesbury Apartments and met FURNELL MILLS. The CI and MILLS went into MILLS' apartment, at which time MILLS sold approximately 14.85 grams of PCP to the CI for \$280.00.

3. On June 27, 2006, at approximately 8:00 p.m., DELVON JONES visited FURNELL MILLS at MILLS' apartment located at 9350 Amesbury Avenue in order to purchase two (2) ounces of PCP. Shortly after JONES left MILLS' residence, the CI entered MILLS' residence and also purchased two ounces (42.78 grams) of PCP for \$640.00.

4. On July 11, 2006, the CI contacted JERRY CORNEY at (216) 322-0808 to discuss the purchase of four (4) ounces of PCP. CORNEY stated that he had two (2) ounces of PCP but would need additional time to secure another two (2) ounces of PCP.

5. On July 20, 2006, at approximately 9:10 p.m., the CI met with CHARLIE COOPER in the vicinity of East 93rd and Hough Avenue and made arrangements for COOPER to sell two (2) ounces of PCP to the CI for \$800.00. COOPER advised the CI to call him in thirty minutes on his cellular telephone number (216) 253-8305.

6. A short time later and still on July 20, 2006, at approximately 10:25 p.m., the CI met CHARLIE COOPER in the vicinity of East 93rd and Amesbury Avenue. The CI advised COOPER that he had \$700.00 for two (2) ounces. COOPER stated that he could not come down in price and that he would sell him 1¾ ounces

-8-

for \$700.00. The CI advised that he would need another vial. COOPER entered 9344 Amesbury Avenue in order to obtain another vial, returned, and sold the CI $1\frac{3}{4}$ ounces (30.25 grams) of PCP for \$700.00.

7. On July 21, 2006, at approximately 2:00 p.m., the CI and UCA, while driving along Amesbury Avenue, met FURNELL MILLS. MILLS advised his new telephone number was (216) 624-1366 and that he was willing to sell PCP to the CI and UCA for \$400.00 per ounce. MILLS further advised that the cost of PCP had gone up because of limited supply.

8. On August 1, 2006, the CI called CHARLIE COOPER at (216) 253-8305 and arranged to purchase four (4) ounces of PCP for \$1,500.00. COOPER told the CI to meet him in the parking lot located at 93rd and Amesbury.

9. A short time later and still on August 1, 2006, EDWARD SIMS went into 9344 Amesbury. Moments later CHARLIE COOPER was observed to exit 9344 Amesbury and entered the CI's vehicle. COOPER sold four vials of PCP (75.43 grams) to the CI for \$1,500.00 and advised the CI that he had some good "stuff" coming soon and to contact him for future purchases of PCP. The CI dipped a cigarette into one of the vials of PCP. COOPER exited the CI's car and re-entered 9344 Amesbury.

10. On August 7, 2006, at approximately 2:30 p.m., the CI contacted EDWARD SIMS on cellular telephone number (216) 323-4312

-9-

and made arrangements to purchase four (4) ounces of PCP for \$1,600.00. SIMS told the CI that he had three (3) ounces of PCP, would sell the same to the CI, then go home to get a fourth ounce of PCP. SIMS said he did not like to drive around with that much PCP. SIMS then told the CI to go to Eddy Road and Ablewhite Avenue.

11. A short time later, and still on August 7, 2006, at approximately 2:45 p.m., the CI met EDWARD SIMS in the vicinity of Eddy Road and Ablewhite Avenue. The CI got into SIMS' vehicle and gave SIMS \$1,200.00. SIMS then distributed three (3) vials (63.21 grams) of PCP to the CI. SIMS then advised that he would go to his home to get the fourth ounce of PCP. SIMS later contacted the CI and advised that he was locked out of his house.

12. On August 16, 2006, at approximately 1:00 p.m., the CI contacted EDWARD SIMS at (216) 323-4312 and advised that he/she wanted to purchase four (4) ounces of PCP. SIMS again advised the CI to meet him at Eddy Road and Ablewhite.

13. A short time later, and still on August 16, 2006, at approximately 2:07 p.m., the CI and UCA met EDWARD SIMS at Eddy Road and Ablewhite. The CI and UCA entered SIMS' vehicle. The CI paid SIMS \$1,600.00 and SIMS distributed four (4) glass vials (85.98 grams) of PCP to the CI.

14. October 17, 2006, at approximately 1:00 p.m., the CI called DERRICK TERRELL at (216) 253-5225 and made arrangements to

-10-

purchase two (2) ounces of PCP. TERRELL told the CI to go to East 93rd and Amesbury Avenue.

15. A short time later, and still on October 17, 2006, at approximately 1:38 p.m., the CI again contacted DERRICK TERRELL at (216) 253-5225. TERRELL, who was driving a green Taurus on Hough Avenue, told the CI to meet him at the shopping plaza located at East 79th and Euclid Avenue.

16. A short time later, and still on October 17, 2006, at approximately 1:45 p.m., the CI and UCA arrived at the shopping plaza. DERRICK TERRELL arrived driving a green Taurus. TERRELL exited his vehicle, approached the CI and UCA in their vehicle, and told the CI that he had only one (1) ounce of PCP on him and to follow him to obtain the second ounce of PCP. The CI and UCA followed TERRELL to his residence located at 8935 Meridian Avenue. TERRELL exited his vehicle, entered the apartment building, and a short time later exited the building and approached the CI in his vehicle. TERRELL distributed two (2) glass vials (44.93 grams) of PCP to the CI for \$600.00.

17. On November 3, 2006, three (3) cans of PCP were shipped to KIM (KENYADA PERRY) for RAHFEL KING at 3744 East 144th Street (One Stop Beverage), Cleveland, Ohio, from the Mail Center, 15727 S. Western Avenue, Gardena, California 90247, and telephone number (310) 366-6996.

-11-

18. On November 13, 2006, the CI contacted DERRICK TERRELL at (216) 253-5225 in order to purchase PCP. TERRELL told the CI to call him back when he had his money.

19. The following day, November 14, 2006, at approximately 1:45 p.m., the CI again contacted DERRICK TERRELL at (216) 253-5225 and advised TERRELL that he/she wanted to purchase five (5) ounces of PCP. TERRELL advised that he was getting his car washed and for the CI to meet him at the car wash located at East 82nd and Carnegie Avenue.

20. A short time later, and still on November 14, 2006, at approximately 2:20 p.m., the CI and UCA arrived at the car wash. TERRELL advised that he was going to get his car washed and that the CI and UCA would then have to follow him to his residence. At approximately 2:32 p.m., TERRELL departed the car wash with the CI and UCA following. TERRELL reached his residence, 8935 Meridian Avenue, at approximately 2:39 p.m., exited his vehicle and entered the apartment building. At approximately 2:43 p.m., TERRELL exited the apartment building, entered the CI's vehicle, and gave the CI five (5) vials (110.94 grams) of PCP. The CI gave TERRELL \$1,800.00.

21. On or about November 12, 2006, KEITH HARPER distributed approximately 32 ounces of PCP to DERRICK TERRELL.

22. On November 15, 2006, DERRICK TERRELL possessed at his apartment, 8935 Meridan Avenue, No. 1, Cleveland, Ohio, sixteen

-12-

(16) vials of PCP (350.72 grams) in a cabinet under a fish tank, six (6) vials of PCP (90.64 grams) on the dining room table, a Smith and Wesson .45 caliber revolver, Model 1917, serial number 88014, loaded with 6 Wolf rounds, and a digital scale.

23. On December 13, 2006, DERRICK TERRELL was in possession of one half ounce of PCP.

24. On January 11, 2007, Carl Henderson, Maurion Lewis, and Gerald Taylor possessed seven (7) Listerine bottles of PCP (5,735.1 grams) at the Extended Stay Hotel, room 106, Brooklyn, Ohio.

25. On January 11, 2007, Carl Henderson possessed at 2350 Wynde Tree Drive, Seven Hills, Ohio, a Listerine bottle of PCP, a money counter, and five (5) DHL labels addressed to "Kim".

26. On January 17, 2007, the UCA and CI met with BIG JEFF, later identified as JEFFREY WOODS, at East 93rd Street and Hough Avenue, at which time they traveled to 9322 Amesbury Avenue for the purpose of purchasing PCP. WOODS entered 9322 Amesbury Avenue and shortly thereafter exited Amesbury and approached the UCA and CI. WOODS told the UCA and CI to meet back on Hough Avenue.

27. A short time later, and still on January 17, 2007, at approximately 7:45 p.m., the UCA and CI met with JEFFREY WOODS and distributed a vial (1.01 grams) of PCP to the UCA and the UCA paid \$60.00.

-13-

28. On January 17, 2007, in the vicinity of 93rd Street and Hough Avenue, Cleveland Police Department detectives acting in an undercover capacity approached two males, one of whom was later identified as DIREZ WILLIAMS, and asked to purchase cigarettes laced with PCP. WILLIAMS dipped three cigarettes into a vial containing PCP (2.24 grams) and sold the same to the detectives for \$60.00. WILLIAMS, as he fled police, threw the vial of PCP on one of the officers attempting to arrest WILLIAMS.

29. On January 23, 2007, a UCA and CI contacted JERRY CORNEY at telephone number (216) 322-0808. CORNEY agreed to sell the CI three (3) PCP cigarettes. The CI went into apartment 7, at 1560 Ansel Road, at which time CORNEY dipped three cigarettes into a vial of PCP (3.59 grams) and sold the same to the CI for \$40.00.

30. On January 23, 2007, two UCAs drove to East 93rd and Hough Avenue and approached AARON NELSON, who was standing in front of 9410 Hough Avenue. NELSON approached the UCA vehicle, at which time a UCA asked to purchase two (2) PCP cigarettes. Simultaneously, an unrelated Cleveland Police Department (CPD) vehicle drove by, at which time NELSON smashed the glass vial with PCP. After the CPD vehicle departed the area, NELSON returned to the UCAs' vehicle and advised that BIG JEFF (JEFFREY WOODS) would serve the UCA. NELSON provided the UCAs with his telephone number of (216) 326-4886. WOODS approached the UCA

-14-

vehicle and the UCAs gave him two (2) cigarettes. WOODS and NELSON then went into the lobby of 9410 Hough Avenue, did an exchange, and WOODS returned to the UCAs' vehicle and gave a UCA two (2) PCP cigarettes dipped in what WOODS purported to be PCP in exchange for \$40.00.

31. Subsequently, and still on January 23, 2007, a UCA and a CI drove to the vicinity of 9410 Hough Avenue. AARON NELSON approached the UCA vehicle, at which time the UCA asked to purchase some "wet" (PCP). NELSON stated that he had to go get it and provided the UCA with telephone number (216) 326-4886.

32. Subsequently, and still on January 23, 2007, NELSON traveled to 9322 Amesbury Avenue and acquired PCP from BOBBY WILSON. NELSON returned to the UCA vehicle and sold the UCA three (3) cigarettes dipped in PCP (2.63 grams) for \$60.00.

33. A short time later, and still on January 23, 2007, AARON NELSON, again in the vicinity of 9410 Hough Avenue, possessed a cellular telephone with number (216) 326-4886 and \$90.00 in proceeds from the sale of PCP (pre-recorded buy money).

34. On February 2, 2007, at approximately 2:59 p.m., a CI called MACIO STUBBS at (216) 324-9038 in order to purchase PCP. Several minutes later, at approximately 3:04 p.m., STUBBS called the CI back, at which time the CI ordered one ounce of PCP. STUBBS advised that he would call the CI back shortly.

-15-

35. A short time later, and still on February 2, 2007, at approximately 3:49 p.m., the CI called MACIO STUBBS at (216) 324-9038. STUBBS advised the CI that he was ready to distribute PCP to the CI.

36. Again, still on February 2, 2007, at approximately 4:08 p.m., MACIO STUBBS directed the CI to go to East 93rd and Edmunds Avenue. STUBBS met with the CI and distributed one ounce (22.62 grams) of PCP to the CI for \$300.00.

37. On March 30, 2007, at approximately 2:10 p.m., a CI called JOHNNY MORGAN at (216) 240-2420 in order to arrange for the purchase of PCP.

38. A short time later, and still on March 30, 2007, at approximately 2:30 p.m., in the vicinity of 2307 East 40th Street, JOHNNY MORGAN approached the CI's vehicle and distributed two (2) vials (.92 grams) of PCP to the CI for \$50.00.

39. On April 4, 2007, at approximately 4:45 p.m., a CI called ARIYEN FLAKES at (216) 322-0422 and ordered three (3) PCP cigarettes. FLAKES directed the CI to go to the area of East 93rd Street and Hough Avenue.

40. A short time later, and still on April 4, 2007, following a second call by the CI to ARIYEN FLAKES, the CI and a UCA traveled to an alley located off East 93rd Street, south of Amesbury Avenue and north of Lamont Avenue, at which time FLAKES and another male entered a vehicle being driven by the CI and a

-16-

UCA. The CI advised that he/she wanted to buy three (3) cigarettes with PCP. FLAKES stated that they would cost \$50.00. Subsequently, a red Mercury Cougar (Ohio license plate number DSF 8351) arrived and FLAKES stated that the person (BILLY HARPER) had the same quality of PCP as FLAKES and that he, FLAKES, would obtain the PCP from the individual (HARPER) in the Cougar. FLAKES exited the CI's vehicle and met with HARPER in the Cougar. FLAKES returned to the CI and advised the CI to see the person in the Cougar to obtain the PCP cigarettes. Subsequently, HARPER distributed three (3) PCP cigarettes (2.62 grams) to the CI. The second male with FLAKES provided the CI with telephone number (216) 254-8115, to call if the CI wanted additional PCP.

41. Several days later, on April 9, 2007, a CI called (216) 254-8115 to arrange with FONTAINE (BILLY HARPER) the purchase of PCP. FONTAINE advised that he would not be available until April 10, 2007, to distribute PCP.

42. On April 10, 2007, at approximately 1:20 p.m., the CI called BILLY HARPER at (216) 254-8115 and told HARPER that he/she wanted PCP. HARPER directed the CI to East 105th Street and St. Clair Avenue.

43. A short time later, and still on April 10, 2007, at approximately 1:30 p.m., a UCA and CI traveled to McDonald's on East 105th Street and St. Clair Avenue. BILLY HARPER arrived driving a red Mercury Cougar (Ohio license number DSF 8351) and

-17-

told the CI and UCA to follow him. At East 102nd Street, HARPER got into the CI/UCA vehicle. The CI asked for a half ounce of PCP. HARPER advised that he did not have a second vial to break down the ounce. The CI agreed to purchase and HARPER sold the ounce (15.74 grams) of PCP to the CI for \$500.00.

44. On April 13, 2007, a CI and a second person called KEITH HARPER at (216) 322-6022 in order to purchase a pint of PCP. At approximately 3:15 p.m., HARPER advised the CI and second person that he did not have the PCP and that he, HARPER, placed a telephone call to "Rob".

45. A short time later, and still on April 13, 2007, at approximately 4:00 p.m., ROBERT CARR and JAMES CARR arrived driving a white Chevrolet Lumina minivan. HARPER entered the van, exited, and went to the CI's vehicle and entered the same. HARPER distributed the pint (334.79 grams) of PCP in an Everfresh Cranberry Juice bottle to the CI for \$5,500.00.

46. On May 4, 2007, TONYA NETTLES and WILLIE FLOWERS possessed 17.9 grams of PCP and an eye dropper.

47. On May 9, 2007, at approximately 4:15 p.m., a CI called JOHNNY MORGAN at (216) 240-2420 in order to arrange for the purchase of PCP. MORGAN stated that he would be at East 40th Street and Central Avenue in fifteen minutes. Subsequently, the CI met MORGAN in the vicinity of East 40th Street and Central

-18-

Avenue and distributed two (2) vials (.78 grams) of PCP to the CI for \$50.00.

48. On May 10, 2007, JOHNNY MORGAN possessed \$4,575 in proceeds from the distribution of PCP.

49. On May 18, 2007, TONYA NETTLES and WILLIE FLOWERS possessed approximately 70 grams of PCP in two (2) vials. Additionally, FLOWERS possessed a 9mm pistol.

50. On May 19, 2007, RAHFEL KING and DAVID PERRY were traveling in interstate commerce, from California, with approximately two (2) gallons of PCP with the intent to bring said PCP back to the greater Cleveland, Ohio area.

All in violation of Title 21, United States Code, Section 846.

COUNT 2

The Grand Jury further charges:

On or about June 23, 2006, in the Northern District of Ohio, Eastern Division, DELVON JONES, aka LIL' B, did knowingly and intentionally distribute approximately 22.67 grams of a mixture or substance containing a detectable amount of phencyclidine (PCP), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

-19-

COUNT 3

The Grand Jury further charges:

On or about June 23, 2006, in the Northern District of Ohio, Eastern Division, FURNELL MILLS, aka JUGG, did knowingly and intentionally distribute approximately 14.85 grams of a mixture or substance containing a detectable amount of phencyclidine (PCP), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 4

The Grand Jury further charges:

On or about June 27, 2006, in the Northern District of Ohio, Eastern Division, FURNELL MILLS, aka JUGG, did knowingly and intentionally distribute approximately 42.78 grams of a mixture or substance containing a detectable amount of phencyclidine (PCP), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 5

The Grand Jury further charges:

On or about July 20, 2006, in the Northern District of Ohio, Eastern Division, CHARLIE COOPER did knowingly and intentionally distribute approximately 30.25 grams of a mixture or substance containing a detectable amount of phencyclidine (PCP), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

-20-

COUNT 6

The Grand Jury further charges:

On or about August 1, 2006, in the Northern District of Ohio, Eastern Division, CHARLIE COOPER did knowingly and intentionally distribute approximately 75.43 grams of a mixture or substance containing a detectable amount of phencyclidine (PCP), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 7

The Grand Jury further charges:

On or about August 7, 2006, in the Northern District of Ohio, Eastern Division, EDWARD SIMS, aka ID, did knowingly and intentionally distribute approximately 63.21 grams of a mixture or substance containing a detectable amount of phencyclidine (PCP), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 8

The Grand Jury further charges:

On or about August 16, 2006, in the Northern District of Ohio, Eastern Division, EDWARD SIMS, aka ID, did knowingly and intentionally distribute approximately 85.98 grams of a mixture or substance containing a detectable amount of phencyclidine (PCP), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

-21-

COUNT 9

The Grand Jury further charges:

On or about October 17, 2006, in the Northern District of Ohio, Eastern Division, DERRICK TERRELL, aka DFUNK, did knowingly and intentionally distribute approximately 44.93 grams of a mixture or substance containing a detectable amount of phencyclidine (PCP), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 10

The Grand Jury further charges:

On or about November 14, 2006, in the Northern District of Ohio, Eastern Division, DERRICK TERRELL, aka DFUNK, did knowingly and intentionally distribute approximately 110.94 grams of a mixture or substance containing a detectable amount of phencyclidine (PCP), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT 11

The Grand Jury further charges:

On or about November 12, 2006, in the Northern District of Ohio, Eastern Division, KEITH HARPER did knowingly and intentionally distribute approximately 32 ounces of a mixture or substance containing a detectable amount of phencyclidine (PCP),

-22-

a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT 12

The Grand Jury further charges:

On or about November 15, 2006, in the Northern District of Ohio, Eastern Division, DERRICK TERRELL, aka DFUNK, did knowingly and intentionally possess with intent to distribute approximately 441.36 grams of a mixture or substance containing a detectable amount of phencyclidine (PCP), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT 13

The Grand Jury further charges:

On or about December 13, 2006, in the Northern District of Ohio, Eastern Division, DERRICK TERRELL, aka DFUNK, did knowingly and intentionally possess with intent to distribute approximately one half ounce of a mixture or substance containing a detectable amount of phencyclidine (PCP), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 14

The Grand Jury further charges:

On or about January 17, 2007, in the Northern District of Ohio, Eastern Division, JEFFREY WOODS, aka BIG JEFF, did

-23-

knowingly and intentionally distribute approximately 1.01 grams of a mixture or substance containing a detectable amount of phencyclidine (PCP), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 15

The Grand Jury further charges:

On or about January 17, 2007, in the Northern District of Ohio, Eastern Division, DIREZ WILLIAMS, aka REZ, did knowingly and intentionally distribute approximately 2.24 grams of a mixture or substance containing a detectable amount of phencyclidine (PCP), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 16

The Grand Jury further charges:

On or about January 23, 2007, in the Northern District of Ohio, Eastern Division, JERRY CORNEY, aka PEANUT, did knowingly and intentionally distribute approximately 3.59 grams of a mixture or substance containing a detectable amount of phencyclidine (PCP), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

-24-

COUNT 17

The Grand Jury further charges:

On or about January 23, 2007, in the Northern District of Ohio, Eastern Division, BOBBY WILSON and AARON NELSON, aka LIL' A, did knowingly and intentionally aid and abet each other in the distribution of approximately 2.63 grams of a mixture or substance containing a detectable amount of phencyclidine (PCP), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 18

The Grand Jury further charges:

On or about February 2, 2007, in the Northern District of Ohio, Eastern Division, MACIO STUBBS did knowingly and intentionally distribute approximately 22.62 grams of a mixture or substance containing a detectable amount of phencyclidine (PCP), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 19

The Grand Jury further charges:

On or about March 30, 2007, in the Northern District of Ohio, Eastern Division, JOHNNY MORGAN did knowingly and intentionally distribute approximately .92 grams of a mixture or substance containing a detectable amount of phencyclidine (PCP),

-25-

a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 20

The Grand Jury further charges:

On or about April 4, 2007, in the Northern District of Ohio, Eastern Division, ARIYEN FLAKES, aka DUB, did knowingly and intentionally distribute approximately 2.62 grams of a mixture or substance containing a detectable amount of phencyclidine (PCP), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 21

The Grand Jury further charges:

On or about April 10, 2007, in the Northern District of Ohio, Eastern Division, BILLY HARPER, aka FONTAINE, did knowingly and intentionally distribute approximately 15.74 grams of a mixture or substance containing a detectable amount of phencyclidine (PCP), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 22

The Grand Jury further charges:

On or about April 13, 2007, in the Northern District of Ohio, Eastern Division, KEITH HARPER, ROBERT CARR, aka LIL' ROB, and JAMES CARR, aka SOLO, did knowingly and intentionally aid and

-26-

abet each other in the distribution of approximately 334.79 grams of a mixture or substance containing a detectable amount of phencyclidine (PCP), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B), and Title 18, United States Code, Section 2.

COUNT 23

The Grand Jury further charges:

On or about May 4, 2007, in the Northern District of Ohio, Eastern Division, TONYA NETTLES and WILLIE FLOWERS did knowingly and intentionally aid and abet each other in the distribution of approximately 17.9 grams of a mixture or substance containing a detectable amount of phencyclidine (PCP), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 24

The Grand Jury further charges:

On or about May 9, 2007, in the Northern District of Ohio, Eastern Division, JOHNNY MORGAN did knowingly and intentionally distribute approximately .78 grams of a mixture or substance containing a detectable amount of phencyclidine (PCP), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

-27-

COUNT 25

The Grand Jury further charges:

On or about May 18, 2007, in the Northern District of Ohio, Eastern Division, TAYNA NETTLES and WILLIE FLOWERS did knowingly and intentionally aid and abet each other in the possession with intent to distribute approximately 70 grams of a mixture or substance containing a detectable amount of phencyclidine (PCP), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 26

The Grand Jury further charges:

On or about May 20, 2007, in the Northern District of Ohio, Eastern Division, RAHFEL KING, aka ROCK, and DAVID PERRY did knowingly and intentionally aid and abet each other in the possession with intent to distribute approximately two (2) gallons of a mixture or substance containing a detectable amount of phencyclidine (PCP), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A), and Title 18, United States Code, Section 2.

COUNTS 27-38

The Grand Jury further charges:

On or about the dates listed below, in the Northern District of Ohio, Eastern Division, and elsewhere, the defendants listed

-28-

below did knowingly and intentionally use a communication facility, to wit: a telephone, to facilitate acts constituting a felony under Title 21, United States Code, Sections 841(a)(1) and 846:

<u>Count</u>	<u>Defendant</u>	<u>Date</u>
27	JERRY CORNEY, aka PEANUT	July 11, 2006
28	CHARLIE COOPER	August 1, 2006
29	EDWARD SIMS, aka ID	August 7, 2006
30	EDWARD SIMS, aka ID	August 16, 2006
31	DERRICK TERRELL, aka DFUNK	October 17, 2006
32	DERRICK TERRELL, aka DFUNK	November 14, 2006
33	MARIO STUBBS	February 2, 2007
34	JOHNNY MORGAN	March 30, 2007
35	ARIYEN FLAKES, aka DUB	April 4, 2007
36	BILLY HARPER, aka FONTAINE	April 10, 2007
37	KEITH HARPER	April 13, 2007
38	JOHNNY MORGAN	May 9, 2007

All in violation of Title 21, United States Code, Section 843(b).

-29-

COUNT 39

The Grand Jury further charges:

On or about November 15, 2006, in the Northern District of Ohio, Eastern Division, DERRICK TERRELL, aka DFUNK, having been previously convicted of crimes punishable by imprisonment for a term exceeding one year, to wit: Drug Abuse, in Case Number CR325014, in the Cuyahoga County Common Pleas Court, on or about July 24, 1995; Drug Trafficking, in Case Number CR324977, in the Cuyahoga County Common Pleas Court, on or about July 24, 1995; Drug Trafficking, in Case Number CR369181, in the Cuyahoga County Common Pleas Court, on or about March 4, 1999; Drug Trafficking, in Case Number CR404594, in the Cuyahoga County Common Pleas Court, on or about September 4, 2001; and Drug Possession, in Case Number CR403675, in the Cuyahoga County Common Pleas Court, on or about September 4, 2001, did knowingly possess in and affecting interstate commerce a firearm and ammunition, to-wit: a Smith and Wesson .45 caliber revolver, Model 1917, serial number 88014, loaded with 6 Wolf rounds, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 40

The Grand Jury further charges:

On or about May 18, 2007, in the Northern District of Ohio, Eastern Division, WILLIE FLOWERS, having been previously convicted of a crime punishable by imprisonment for a term

-30-

exceeding one year, to wit: Drug Trafficking, in Case Number CR03-438629, in the Cuyahoga County Common Pleas Court, on or about June 17, 2004, did knowingly possess in and affecting interstate commerce a firearm and ammunition, to-wit: a Ruger 9mm caliber pistol, serial number 31603659, loaded with 15 rounds, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 41

The Grand Jury further charges:

On or about May 19, 2007, the exact dates to the Grand Jury unknown, in the Northern District of Ohio, Eastern Division, and elsewhere, RAHFEL KING, aka ROCK, and DAVID PERRY did attempt to travel in interstate commerce between the State of California and the State of Ohio with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, to wit: a business enterprise involving the distribution of phencyclidine (PCP), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846; and said RAHFEL KING and DAVID PERRY did perform and attempt to perform

-31-

acts to promote, manage, carry on, and facilitate the promotion, management, and carrying on of said unlawful activity.

All in violation of Title 18, United States Code, Sections 1952 and 2.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.